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June 6, 2025

VIA ECF ONLY

Hon. Sanket J. Bulsara
U.S. District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Allstate Ins. Co., et al. v. Rybak, et al.*, 22-cv-4441(SJB)(VMS)
Related Cases: 1:25-mc-01838 (SJB)(VMS)
1:25-mc-01674 (SJB)(VMS)
2:25-mc-01865 (SJB)(VMS)

Dear Hon. Bulsara:

Along with Cadwalader, Wickersham & Taft LLP, we represent Plaintiffs in the above referenced matter. We submit this letter in response to the Court's Order, dated May 23, 2025, directing Plaintiffs to address the status of the four defendants who have not appeared in this action.¹ In view of the agreement in principle Plaintiffs reached with the sole remaining defendant, Oleg Rybak, whose counsel is presently reviewing a draft settlement agreement, Plaintiffs respectfully request that they be permitted to advise the Court of how it intends to proceed as to the Defaulted Defendants 30 days after the Parties file a stipulation

¹ Specifically, the Court's May 23, 2025 Order directed Plaintiffs to inform the Court "whether they intend to pursue any claims against the Defendants subject to the Court's May 8, 2023 Order." The Court's prior May 8, 2023 Order applies to Defendants Francis Joseph Lacina, MD, JFL Medical Care PC, FJL Medical Services PC, RA Medical Services PC (collectively, the "Defaulted Defendants") and JPC Medical PC. On September 19, 2024, Defendant JPC Medical PC settled. *See* Dkt. No. 116. Thus, there are only four Defaulted Defendants remaining in this action.

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of dismissal pursuant to the settlement agreement or, in the unlikely event, otherwise advise the Court that the settlement could not be completed. Once the agreement has been completed, Plaintiffs will be in a better position to determine how it wishes to proceed against the Defaulted Defendants.

We thank the Court for its consideration in this regard.

Very truly yours,

MANNING | KASS

A handwritten signature in black ink, appearing to read 'Erica L. Mobley', written over the printed name.

Erica L. Mobley, Esq.

ELM